

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et. als.*

Debtors¹

PROMESA Title III

No. 17 BK 3283 (LTS)

(Jointly Administered)

**NOTICE OF INTENT TO REPLY TO FOUR HUNDRED NINETY-SIXTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO TO PARTIALLY SATISFIED AND PARTIALLY NO LIABILITY CLAIMS OF
BEHALF OF POTRERO LOS LLANOS, INC.**

TO THE HONORABLE COURT:

COMES NOW, Potrero Los Llanos, Inc. (“Los Llanos”), through its undersigned counsel,
and respectfully submits the instant notice as to the *Four Hundred Ninety-Sixth Omnibus Objection*
(*Substantive*) *Of the Commonwealth of Puerto Rico to Partially Satisfied and Partially No Liability*
Claims (ECF No. 21749) as follows:

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On May 21, 2018, Los Llanos filed its Claim No. 17818 (the “Claim”) against the Commonwealth of Puerto Rico (the “Commonwealth”) for \$11,013.06 premised on vouchers 16890405, 16890409, 16890414 and 16890438 submitted to the Administration of the Industry and the Racing Sport for Puerto Rico (the “AIDH”).

2. On August 5, 2022, the Commonwealth filed an objection to the Claim on the basis that the it purports to assert liabilities associated with the Commonwealth but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth, such that the Debtors are unable to determine whether Los Llanos has a valid claim against the Commonwealth or any of the Title III debtors (the “Objection”).

3. Los Llanos is in the process of gathering additional information in support of the Claim at the Office of the Director of the Racing Sport Bureau, part of the Gaming Commission of Puerto Rico, formerly the AIDH, in order to reply to the Objection.

WHEREFORE, Los Llanos requests a term of fifteen (15) days to reply to the Objection.

San Juan, Puerto Rico, this 18th day of August 2022

s/CHARLES A. CUPRILL-HERNÁNDEZ
USDC-PR 114312

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